

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

John Trenton Pendarvis,)	
)	Civil Action No. 2:22-3142-BHH-MHC
Plaintiff,)	
)	
v.)	
)	
Alan M. Wilson, Mark A. Keel, Hugh E.)	RESPONSES TO LOCAL RULE 26.01
Weathers, L.C. Knight, W. Jeffrey Young,)	INTERROGATORIES OF DEFENDANTS
Robert D. Cook, Emory Smith, Jr., Joanne)	KEEL, WHITSETT, O'NEAL, WELLS,
Lee, David S. Jones, T. Stephen Lynch,)	WOOD, NEALE, AND HOLDEN
Harley L. Kirkland, Wesley Vorberger,)	
Robert Kittle, Adam L. Whitsett, Frank)	
O'Neal, Jason Wells, Glenn Wood,)	
John Neale, Rhett Holden, Alden G. Terry,)	
Derek M. Underwood, J. Clint Leach,)	
Aaron Wood, John Stokes, Vanessa Elsalah,)	
Brittany Jeffcoat, Eva Moore, Ray Dixon,)	
Frank Thompson, Robert Krutak, Jonathan)	
Calore, Charlie Scrubbs, and Wayne Eaddy,)	
)	
Defendants.)	
<hr style="width: 40%; margin-left: 0;"/>)	

Pursuant to Rule 26.01 of the Local Civil Rules of the United States District Court for the District of South Carolina, the Defendants Mark A. Keel, Adam L. Whitsett, Frank O'Neal, Jason Wells, Glenn Wood, John Neale, Rhett Holden (hereinafter collectively referred to as "SLED Defendants") submit the following answers to interrogatories as required by the Court:

1. State the full name, address, and telephone number of all personal or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE #1:

None.

2. As to each claim, state whether it should be tried jury or non-jury and why.

RESPONSE #2:

The parties have demanded a trial by jury.

3. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent; subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE #3:

Not applicable to the SLED Defendants.

4. State the basis asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE #4:

The incident that is the subject of this lawsuit occurred in Dorchester County, South Carolina, which is located within the Charleston Division.

5. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number in the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may* be related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happening or events; involve the identical

parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE #5:

The SLED Defendants are not aware of any related actions filed within the United States District Court - District of South Carolina.

6. If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE #6:

The SLED Defendants are properly identified.

7. If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

RESPONSE #7:

Not applicable.

LINDEMANN & DAVIS, P.A.

BY: s/ Andrew F. Lindemann
ANDREW F. LINDEMANN #5070
5 Calendar Court, Suite 202
Post Office Box 6923
Columbia, South Carolina 29260
(803) 881-8920
Email: andrew@ldlawsc.com

Counsel for Defendants Mark A. Keel, Adam L. Whitsett, Frank O'Neal, Jason Wells, Glenn Wood, John Neale, and Rhett Holden

November 15, 2022